

## REMARKS

This communication is a full and timely response to the final Office Action dated February 20, 2008. Claims 1-5, 9-13, 15, 16, and 20-22 remain pending where claims 6-8 and 14 were previously canceled and claims 17-19 are withdrawn. By this communication, claims 17-19 are canceled without prejudice or disclaimer of the underlying subject matter, claims 1, 10, and 13 are amended, and claims 20-22 are added. Support for the amended subject matter can be found, for example, at page 7, lines 6-15 and at page 9, lines 21-31.

### **Examiner's Interview**

Applicant appreciates the Examiner granting a personal interview on June 26, 2008. During the interview, Applicant demonstrated an exhibit of the claimed embodiments. Applicant and the Examiner discussed the claims in view of the applied art. The Examiner acknowledged that features presented during the demonstration would distinguish the claims over the applied.

### **Rejections Under 35 U.S.C. §102**

In numbered paragraph 12 on page 5 of the Office Action, claims 1-5 and 9-13 stand rejected under 35 U.S.C. §102(e) for alleged anticipation over *Chasen et al.* (USPN 6,760,721). Applicant respectfully traverses this rejection.

As shown in Figs. 1-9B, Applicants embodiments are directed to a system that includes a database that stores plural words, which are hierarchically arranged into various levels based on a common language structure and common root features. The system displays a first window in which words stored in the database are displayed. The system can advance through at least one level of words in the

database hierarchy based on a sequence of keystrokes input by a user. The words stored in the database can be displayed in a first window based as the system advances through the database hierarchy. The words are displayed as a multi-level hierarchy that is integrated into a single text line. One of the words in the first window is selected based on an input of the user. The selected word is displayed in a second window. The selected word is displayed in a descriptor that includes at least one other word located in at least one immediately preceding level in the word hierarchy. The descriptor is displayed as a single line of text.

Applicant's claim 1 broadly encompasses the aforementioned embodiments by reciting the following:

1. A method of inputting text into a data processing apparatus, including the steps of:
  - a. providing a database of words that are arranged hierarchically into a plurality of levels based on a common language structure;
  - b. advancing through the word hierarchy based on a sequence of keystrokes input by a user;
  - c. displaying, in said first window, a plurality of said words provided in the database in said first window as the user advances through the hierarchy, wherein each of said plurality of words is a multi-level hierarchy that is integrated into single text line;
  - d. selecting at least one first word from said plurality of words shown in said first window; and
  - e. displaying said at least one first word selected in said step (d) in a second window, wherein said at least one first word is displayed in said second window in a descriptor that includes at least one second word located in at least one immediately preceding level in the word hierarchy, and wherein the at least one first word and the at least one second word are integrated into a single text line.

*Chasen* fails to disclose or suggest the combination of features recited in claim 1 and claim 13, which similarly recites those features provided in claim.

*Chasen* discloses a system that collects metadata from various sources. The collected data is organized and displayed in a user interface as a hierarchical tree. The user interface includes a tree window and a table window. The tree window

providing various ways to group and categorize audio data using leaf and non-leaf nodes. When the user selects a node, the table window displays information associated with the node. For example, if the selected node is a leaf node, the node table displays audio tracks that fall within the selected grouping. On the other hand, if the selected node is a non-leaf node, the node table displays collective information about the tracks within the sub-groupings of the selected grouping (col. 7, lines 43-62; col. 8, line 28 through col. 9, line 23).

*Chasen*, however, fails to disclose or suggest at least that the audio data is organized based on a common language structure and displaying, in said first window, a plurality of said words provided in the database in said first window as the user advances through the hierarchy, wherein each of said plurality of words is a multi-level hierarchy that is integrated into single text line. Rather, *Chasen* discloses that a groupings tree provides ways to group and categorize audio metadata by Album, Artist, Genre, fields of the metadata database, and other groupings or categories. There is no evidence that *Chasen* contemplates using a common language structure as recited in Applicants' claims.

As provided in Applicant's disclosure, the database is arranged based on a common language structure that includes topic descriptors wherein words are grouped into common categories based on the significance and/or meaning of the words. Because *Chasen* is directed to the organization of audio files it does not appear that the database is arranged hierarchically based on a common language structure. Therefore, a *prima facie* case of anticipation has not been established.

To properly anticipate a claim, the document must disclose, explicitly or implicitly, each and every feature recited in the claim. See Verdegall Bros. v. Union

Oil Co. of Calif., 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Based on the foregoing discussion, Applicant requests that the rejection of independent claims 1 and 13 and their corresponding depending claims be withdrawn.

**Conclusion**

Claims 20 -22 variously depend from claim 1, and are distinguishable over the applied art by virtue of this dependency and the additional features recited therein. Thus, based on the foregoing amendments and remarks, Applicant respectfully submits that claims 1-5, 9-13, and 15-22 are allowable and this application is in condition for allowance. In the event any issues remain, the PTO is invited to contact the undersigned representative.

Respectfully submitted,

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